

LAW OFFICE OF
PAUL CAGHAN, P.C.

2506 North Clark Street
Chicago, Illinois 60614

attorney at law
Tel. (312) 251-1101

May 17, 2008

Paul T. Fox
GREENBERG TRAURIG, LLP
77 West Wacker Drive
Suite 2500
Chicago, IL 60601

Re: Patel v. Patel
U.S.D.C. #08 C 386

Dear Mr. Fox:

The plaintiffs requests documents which are necessary to address the defendants' concerns about particularity and factual detail of the complaint. Accordingly, the plaintiffs request that defendants provide within 21 days, the following documents:

(1) All contract documents, books, records, cancelled checks, bank statements, financial instruments, letters, memoranda, notes, deposit slips, emails or other documents relating to or touching upon communications between AAHOA and all food vendors or entertainers hired or invited to bid for AAHOA conventions that took place from January 1, 2003 through May 1, 2008.

(2) All books, records, cancelled checks, bank statements, financial instruments, letters, memoranda, notes, deposit slips, emails or other documents relating to transactions between DANNY PATEL or any entity in which he has an interest and any food vendors or entertainers hired or invited to bid for AAHOA conventions that took place from January 1, 2003 through May 1, 2008.

(Letter to Mr. Paul T. Fox, May 17, 2008, p. 2):

(3) All books, records, cancelled checks, bank statements, financial instruments, letters, memoranda, notes, deposit slips, emails or other documents relating to transactions between ASHWIN PATEL or any entity in which he has an interest and any food vendors or entertainers hired or invited to bid for AAHOA conventions that took place from January 1, 2003 through May 1, 2008.

(4) All documents relating to or touching upon any payments made, directly or indirectly, by DANNY PATEL or any entity in which he has an interest to or for the benefit of any other AAHOA member from January 1, 2003 through May 1, 2008.

(5) All documents relating to or touching upon any payments made, directly or indirectly, by ASHWIN PATEL or any entity in which he has an interest to or for the benefit of any other AAHOA member from January 1, 2003 through May 1, 2008.

(6) All notes, correspondence, minutes, transcripts, logs, recordings, memoranda, drafts, emails, presentations, directors' documents, and all other documents relating to any Performance Appraisal Report or PAR or Report Card from January 1, 2003 through May 1, 2008.

(7) Franchise agreements, correspondence, emails, notes, memoranda and all communications between Choice Hotels or Wyndham Hotels and DANNY PATEL or any entity in which he has an interest.

(8) Franchise agreements, correspondence, emails, notes, memoranda and all communications between Choice Hotels or Wyndham Hotels and ASHWIN PATEL or any entity in which he has an interest.

(9) AAHOA expenditure and receipt statements, checking ledgers, copies of cancelled checks, copies of deposits and all AAHOA income and expense records for the time period January 1, 2003 through May 1, 2008.

(10) AAHOA financial statements, statements of financial condition, federal tax returns and schedules, state tax returns, and all data on the financial health of AAHOA made or created at any time from January 1, 2003 through May 1, 2008.

(Letter to Mr. Paul T. Fox, May 17, 2008, p. 3):

Please forward these materials by June 9, 2008. As always, please do not hesitate to call should you have comments or questions of any kind, whatsoever.

Sincerely,

A handwritten signature in black ink, appearing to be 'PC' with a stylized flourish.

Paul Caghan

PC/ms